

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: )  
 ) Case No. 20-10699 TPA  
Dennis I. Henderson, Sr., )  
 ) Chapter 13  
Debtor ) Related to Docket No.  
 )  
 )  
Dennis I. Henderson, Sr., )  
 )  
Movants )  
 )  
vs. )  
 )  
The Bank of New York Mellon, The )  
Successor to JP Morgan Chase Bank, as )  
Trustee for CIT Home Equity Loan Trust )  
2002-2 c/o Caliber Home Loans, )  
 )  
Respondent )

**STATUS REPORT REGARDING OBJECTION TO CLAIM 4-1 FILED BY  
RESPONDENT**

AND NOW, comes the Debtor, Dennis I Henderson, Sr., by and through attorney Christopher M. Frye, and Steidl and Steinberg, P.C., and respectfully represent as follows:

1. This case was commenced on December 15, 2020 when the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. The Debtor filed an objection to Respondent's mortgage claim on March 23, 2021 and a hearing was held on that objection on May 5, 2020.
3. At the hearing, the parties informed the court that they had a general agreement and the court ordered that the parties file a consent order on or before May 19, 2020.

4. Part of the agreement between the parties is that the Respondent provide Debtor's counsel with an Amended Proof of Claim to be filed after review, which resolves the claim objection.

5. The parties remain in agreement on all terms, but Debtor's counsel is awaiting the Amended Proof of Claim from the Respondent for review.

6. Upon receipt of the Amended Proof of Claim, the parties can then enter into the consent order as ordered or Debtor's counsel can withdraw the objection to claim, either of which would resolve the matter.

7. The parties do not believe that there has been any undue delay in resolution and continue to have an agreement, but just need some additional time to get the Amended Claim filed and then execute a consent order or withdraw the objection.

8. The parties believe that the aforementioned can be achieved within 14 days.

**WHEREFORE**, Debtors respectfully file this Status Report and respectfully request 14 days to file a consent order or withdraw the claim objection.

Respectfully submitted,

May 19, 2021  
DATE

/s/ Christopher M. Frye  
Christopher M. Frye, Esquire  
Attorney for the Debtor

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